

EXHIBIT A

From: Tasha Blakney tblakney@eblaw.us
Subject: Re: RSLs v. Janus // Outstanding Discovery Items
Date: October 12, 2022 at 8:13 AM
To: West, Kim KWest@ashcroftlawfirm.com, Hassid, Alex alex.hassid@blankrome.com
Cc: Brennan, Nathan nbrennan@ashcroftlawfirm.com

TB

Thanks much.

Eldridge & Blakney, PC
865.544.2010
Tblakney@eblaw.us
www.eblaw.us

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From: West, Kim <KWest@ashcroftlawfirm.com>
Sent: Wednesday, October 12, 2022 9:01:45 AM
To: Tasha Blakney <tblakney@eblaw.us>; Hassid, Alex <alex.hassid@blankrome.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Good morning, Tasha. We agree to Oct 28 as the production date.

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC
P: (617) 573-9400 |
KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Tasha Blakney <tblakney@eblaw.us>
Sent: Tuesday, October 11, 2022 3:20 PM
To: West, Kim <KWest@ashcroftlawfirm.com>; Hassid, Alex <alex.hassid@blankrome.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Hi Kim:
Thanks for your follow-up.
You are correct. We believe October 28 is a realistic expectation.
Thanks much and let us know,
Tasha

Tasha C. Blakney, Attorney and Rule 31 Listed General Civil Mediator
ELDRIDGE & BLAKNEY, P.C.
The Cherokee Building
400 West Church Avenue, Suite 101
Knoxville, Tennessee 37902
(T) 865.544.2010 (F) 865.544.2015
tblakney@eblaw.us | www.eblaw.us

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From: West, Kim <KWest@ashcroftlawfirm.com>
Sent: Tuesday, October 11, 2022 1:49 PM
To: Tasha Blakney <tblakney@eblaw.us>; Hassid, Alex <alex.hassid@blankrome.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Thanks, Tasha. We can agree to the target date of Oct 28 only assuming if Oct 28 is realistic. I assume you have a good sense already of what you have to look through or you would not have picked Oct 28?

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC

P: (617) 573-9400 |
KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Tasha Blakney <tblakney@eblaw.us>
Sent: Monday, October 10, 2022 8:30 PM
To: West, Kim <KWest@ashcroftlawfirm.com>; Hassid, Alex <alex.hassid@blankrome.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: Re: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

We are anticipating the ability to produce by October 28. Of course, we'll produce earlier if we're able and will, likewise, advise if that anticipated timeline proves unrealistic. Please let us know if we may agree to a target date of October 28.

Thanks,
Tasha

Eldridge & Blakney, PC
865.544.2010
Tblakney@eblaw.us
www.eblaw.us

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From: West, Kim <KWest@ashcroftlawfirm.com>
Sent: Monday, October 10, 2022 8:04:32 PM
To: Tasha Blakney <tblakney@eblaw.us>; Hassid, Alex <alex.hassid@blankrome.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Thank you, Tasha. What is your new expected production date?

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC
P: (617) 573-9400 |
KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Tasha Blakney <tblakney@eblaw.us>
Sent: Monday, October 10, 2022 6:02 PM
To: Hassid, Alex <alex.hassid@blankrome.com>; West, Kim <KWest@ashcroftlawfirm.com>
Cc: Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Good afternoon, Kim:
I hope you are doing well.
I'm following up on Alex's email below from Thursday of last week.
Could you please let us know your client's position on an agreed production extension by mid day tomorrow?

mid-day tomorrow.

Best regards,
Tasha

Tasha C. Blakney, Attorney and Rule 31 Listed General Civil Mediator
ELDRIDGE & BLAKNEY, P.C.
The Cherokee Building
400 West Church Avenue, Suite 101
Knoxville, Tennessee 37902
(T) 865.544.2010 (F) 865.544.2015
tblakney@eblaw.us | www.eblaw.us

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From: Hassid, Alex <alex.hassid@blankrome.com>
Sent: Thursday, October 6, 2022 3:21 PM
To: West, Kim <KWest@ashcroftlawfirm.com>
Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

The reality is that it has taken us longer than we would have anticipated to get your client's feedback to our proposed narrowing of the overly broad discovery requests. This delay has affected our ability to produce on or before October 14. Even before this delay, the court had already signaled that an extension of the production deadline may be needed and, with the extension of the discovery deadline and trial date, we think the reasonable approach is for the parties to discuss amongst themselves an extension to the production deadline. Indeed, we think this is exactly the type of thing the parties should be able to agree to without burdening the court.

On the other hand, if you insist that we seek Court intervention, we will need to explain the timeline of events, including as to your client's delay in responding to our proposed narrowing of RSLs's overbroad discovery requests (which suggestions we provided to you before the parties' joint status report was submitted) and by the subsequent efforts of your client to change some of the narrowing on which we believed we already had agreed.

It remains our goal to complete review as quickly as possible but October 14 is simply no longer feasible. We are happy to discuss with you a proposed agreed timetable. Please let us know your position as soon as possible.

- .

Best,
Alex

Alex Hassid
BLANKROME

O: (212) 885-5268 | C: (516) 698-4019 | ALEX.HASSID@BLANKROME.COM

From: West, Kim <KWest@ashcroftlawfirm.com>
Sent: Thursday, October 6, 2022 10:02 AM
To: Hassid, Alex <alex.hassid@blankrome.com>
Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Thanks, Alex. We look forward to receiving your clients' production on Oct 14 unless the court determines otherwise.

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC

P: (617) 573-9400 |
KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Hassid, Alex <alex.hassid@blankrome.com>
Sent: Thursday, October 6, 2022 9:10 AM
To: West, Kim <KWest@ashcroftlawfirm.com>
Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>
Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

Apologies for the delay in responding. I was observing the Jewish holiday.

In answer to your question, we believe our searches are crafted to identify these types of documents. These final negotiation points have delayed the start of our review, which makes it far less likely that we'll be able to complete that review and produce by 10/14 (given the volume of documents for review).

Best,

Alex

Alex Hassid

BLANKROME

O: (212) 885-5268 | C: (516) 698-4019 | ALEX.HASSID@BLANKROME.COM

From: West, Kim <KWest@ashcroftlawfirm.com>

Sent: Tuesday, October 4, 2022 9:12 AM

To: Hassid, Alex <alex.hassid@blankrome.com>

Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Thanks, Alex.

If you are explicitly representing that the searches of your clients' documents will identify and gather documents relating to price/cost changes, then we are willing to forgo the additional language.

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC

P: (617) 573-9400 |

KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Hassid, Alex <alex.hassid@blankrome.com>

Sent: Monday, October 3, 2022 5:40 PM

To: West, Kim <KWest@ashcroftlawfirm.com>

Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

Thanks for this

THANKS FOR THIS.

With respect to your proposed additional language in RFP No. 2, we don't think it is appropriate or necessary. Since RSLs's interrogatory 1 and RFP no. 2 were originally drafted as covering the same subjects, so we had been negotiating the narrowing of the former on the understanding that it would also be used for the latter.

Second, and in any event, we don't think the new language is needed because we anticipate that our search and production will capture that pricing information. Documents related to an actual or proposed change in provider would necessarily encompass accompanying changes in pricing.

Thank you.

Best,
Alex

Alex Hassid

BLANKROME

O: (212) 885-5268 | C: (516) 698-4019 | ALEX.HASSID@BLANKROME.COM

From: West, Kim <KWest@ashcroftlawfirm.com>

Sent: Monday, October 3, 2022 10:45 AM

To: Hassid, Alex <alex.hassid@blankrome.com>

Cc: Tasha Blakney <tblakney@eblaw.us>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Thanks, Alex. We have accepted your proposals and added some language regarding communications.

Best regards,

Kim
Kim West

Ashcroft Sullivan LLC

P: (617) 573-9400 |

KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Hassid, Alex <alex.hassid@blankrome.com>

Sent: Sunday, October 2, 2022 9:41 AM

To: West, Kim <KWest@ashcroftlawfirm.com>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

<nbrennan@ashcroftlawfirm.com>

Cc: Tasha Blakney <tblakney@eblaw.us>

Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

Thanks for the follow-up. Regarding your proposed narrowing of RSLs's remaining discovery requests, we have a few additional changes (redlined in the attached). We revised some language in Rog 2 to track the language that is now used in Rog 1 and RFP 2. Your revisions to RFP 3 expanded the request, which initially covered "the secured housing requirements of the Somalia Task Order"—your new text eliminated the reference to "requirements" and requested everything referring or relating to housing/life support services, to which we cannot agree. Our changes address that issue. Otherwise, our position on RFP 17 is that it is covered by RSLs's other requests, so while we are comfortable with your proposed narrowing, our production in response will be subject to Defendants' existing objections to RSLs's other requests.

As for a privilege log, it is premature for us to estimate a delivery date given the significant volume of documents we still need to review.

Best,
Alex

Alex Hassid

BLANKROME

O: (212) 885-5268 | **C:** (516) 698-4019 | ALEX.HASSID@BLANKROME.COM

From: West, Kim <KWest@ashcroftlawfirm.com>

Sent: Friday, September 30, 2022 6:17 PM

To: Hassid, Alex <alex.hassid@blankrome.com>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

Cc: Tasha Blakney <tblakney@eblaw.us>

Subject: RE: RSLs v. Janus // Outstanding Discovery Items

Dear Alex,

Regarding the issue of narrowing RSLs's discovery requests, the changes you proposed for Interrogatory No. 1 in your September 21 email are acceptable to us. With respect to the other revisions we proposed in a redline of the requests at issue attached to my email on August 31 (attached for reference), can you confirm we are in agreement for the remainder of the requests, i.e., Interrogatory No. 2, RFP Nos. 2, 3 and 17?

On October 4 we intend to provide supplemental written responses to Defendants' discovery requests which will address the purported deficiencies raised by Defendants in June as well as written responses to Defendants' July discovery requests. We also intend to make a small supplemental production of documents in response to Defendants' June deficiency concerns and their July requests for production.

On a related note, we also anticipate following up with a relatively small privilege log after October 4. Do Defendants anticipate producing a privilege log and if so, do you have an estimate

delivery date?

Best regards,

Kim

Kim West

Ashcroft Sullivan LLC

P: (617) 573-9400 |

KWest@ashcroftlawfirm.com | www.ashcroftlawfirm.com



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From: Hassid, Alex <alex.hassid@blankrome.com>

Sent: Thursday, September 29, 2022 3:03 PM

To: West, Kim <KWest@ashcroftlawfirm.com>; Brennan, Nathan <nbrennan@ashcroftlawfirm.com>

Cc: Tasha Blakney <tblakney@eblaw.us>

Subject: RSLs v. Janus // Outstanding Discovery Items

Hi Kim,

We wanted to confirm receipt of the subpoenas you forwarded, but also wanted to check on the status of a couple of outstanding discovery items for which we are awaiting more information from you.

First, we sent you our language for the proposed narrowing of RSLs's discovery requests on 9/21. Your email response that day said you would take a look, but we haven't heard back from you. Are we in agreement? We very much need to put that issue to bed to have any hope of producing documents on October 14, since the requests will inform how we conduct the searches to compile for review. That Oct. 14 is already in jeopardy, so we'd like to move quickly to get this sorted.

Second, in the back and forth concerning the joint status report, we asked a few times what exactly you plan to provide on October 4. We'd like to understand specifically whether will you be providing written responses to our July discovery requests? Will you be providing your position with respect to the dozen-plus discovery deficiencies we identified in June? And will you be producing any documents? With respect to the second item, that is important because we need to understand if any areas of disagreement remain that require a meet and confer.

Please let us know. Thank you.

Best,
Alex

Alex Hassid I BLANKROME

1271 Avenue of the Americas I New York, NY 10020

O: (212) 885-5268 I C: (516) 698-4019 I F: (212) 202-3932 I

alex.hassid@blankrome.com

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